

1 ALESHIRE & WYNDER, LLP
WILLIAM W. WYNDER, Bar No. 84753
2 DAWN C. HONEYWELL, Bar No. 110700
ANTHONY R. TAYLOR, Bar No. 208712
3 18881 Von Karman Avenue, Suite 400
Irvine, CA 92612
4 Telephone: (949) 223-1170
Facsimile: (949) 223-1180
5
6 Attorneys for Petitioner,
CARSON REDEVELOPMENT AGENCY

7
8 **BEFORE THE STATE OF CALIFORNIA**
9 **STATE WATER RESOURCES CONTROL BOARD**

10
11 In re Petition of:) SLIC NO. 0496F5
12 CARSON REDEVELOPMENT AGENCY,) SITE ID NO. 2040112
13)
Petitioner,)
14 From the decision of the:) **PETITION FOR REVIEW**
15 CALIFORNIA REGIONAL WATER QUALITY)
CONTROL BOARD, LOS ANGELES REGION)
16)
Respondent.)
17

18
19 The Carson Redevelopment Agency (the "Agency") hereby respectfully submits this
20 petition to the State Water Resources Control Board (the "State Water Board") to challenge an
21 order dated January 21, 2009 by the Regional Water Quality Control Board, Los Angeles Region
22 (the "RWQCB") to the Agency for (1) a site-specific human health risk evaluation report and (2) a
23 work plan for complete groundwater characterization, including an investigation of the alleged
24 saturated zone through continuous coring and collection of discrete groundwater samples with
25 appropriate depth intervals (the "Order").

26 The Order concerns vacant real property located at 21208 Shearer Ave., Carson, CA 90745-
27 1520 (the "Site") that is not intended for residential or commercial development, but rather for open
28 space as a park. A copy of the Order is attached hereto as Exhibit "A". The additional technical

PETITION FOR REVIEW

1 studies sought by the Order would make the use of the Site as a park cost-prohibitive.

2 The deadline to complete the site-specific human health risk evaluation report and work
3 plan described in the Order was originally set for March 27, 2009. The Agency recently made a
4 request to the RWQCB through a letter dated February 17, 2009, that the due date for the technical
5 reports sought in the Order be extended for an additional ninety (90) days from the current March
6 27, 2009 deadline. Additionally, the Agency also requested an extension of ninety (90) days to
7 petition the State Water Board. A true and correct copy of the Agency's above letter is attached
8 hereto as Exhibit "B".

9 Through a letter dated February 18, 2009, the RWQCB granted the Agency's extension
10 request, in part, for the technical reports sought in the Order and set a new deadline for the Agency
11 to complete the same by May 29, 2009 (rather than the requested extension of ninety (90) days).
12 However, the RWQCB refused to extend the Agency's deadline to file this petition. A true and
13 correct copy of the RWQCB's February 18, 2009 letter to the Agency is attached hereto as Exhibit
14 "C".

15 In bringing this petition before the State Water Board, the Agency alleges the following
16 facts and legal arguments as required by the California Code of Regulations, Title 23, Section
17 2050:

18 1. Name, Address, Telephone Number and E-Mail Address Of Petitioner.

19 Carson Redevelopment Agency
20 Attn: Jeff F. Westbrook
21 Redevelopment Manager
22 1 Civic Plaza Drive
23 Suite 500
24 Carson, CA 90745
25 (310) 233-4800
26 jwestbro@carson.ca.us

27 And a copy to:

28 Aleshire & Wynder, LLP
Attn: Anthony R. Taylor, Esq.
18881 Von Karman Avenue, Suite 400
Irvine, CA 92612
(949) 223-1170
ataylor@awattorneys.com

1 2. Specific Action Of The RWQCB Sought For Review.

2 The specific action of the RWQCB sought for review is the attached Order, as Exhibit "A",
3 dated January 21, 2009 to the Agency for (1) a site-specific human health risk evaluation report, (2)
4 a work plan for complete groundwater characterization, including an investigation of the alleged
5 saturated zone through continuous coring and collection of discrete groundwater samples with
6 appropriate depth intervals and (3) all other aspects of the Order.

7 The Agency also seeks the State Water Board's review of the RWQCB's February 18, 2009
8 letter to the Agency, attached hereto as Exhibit "C", modifying the above Order, but not extending
9 the Agency's deadline to respond to the same as requested by the Agency, and denying the
10 Agency's request for an extension to file this petition.

11 3. The Dates On Which The RWQCB Acted Or Refused To Act.

12 January 21, 2009 and February 18, 2009.

13 4. Statement Of The Reasons Why The Agency Challenges The RWQCB's Actions.

14 To date, the Site has been extensively investigated by Eco & Associates, Inc. ("Eco") and
15 others beginning in 1990. Additionally, portions of the Site have been excavated to depths of up to
16 13 feet and approximately 2,670 tons of hydrocarbon impacted soil removed from the Site for
17 treatment (Eco, 2006). Post remediation soil gas survey assessment (Eco, 2008) clearly indicate
18 that all significant remaining hydrocarbon impacts are restricted to the uppermost 10 to 22 feet of
19 soil and do not extend to groundwater located at a depth of 38 feet.

20 Data available from the site investigations performed on the Site indicate that the Site is
21 well assessed both horizontally and vertically. Investigations undertaken by Eco and others include
22 deeper (20 to 40 feet deep) soil sampling locations on an average of 30 foot centers and adequately
23 assess the entire Site. This assessment work is in addition to soil sampling locations by others
24 (Jack K. Bryant and Associates, Inc., 1990b and 1990c, and California Environmental, 1996) and
25 the deeper soil gas survey undertaken by Eco (Eco, 2007). Therefore, the pre and post remediation
26 assessment activities have fully assessed the vertical and lateral extent of hydrocarbon impacted
27 soil, as well as characterizing the types of hydrocarbons present, and no additional studies are
28 required.

1 Detectable concentrations of hydrocarbons reported at a depth of approximately 40 feet
2 (below the top of the groundwater) are attributed to regional groundwater impacts likely associated
3 with the nearby Golden Eagle Refinery site (the southeast corner of which was located
4 approximately 400 feet to the east) and possibly other known sources such as the Garden Valley
5 Landfill (located approximately 950 feet to the northwest). Further vertical assessment by a soil
6 gas survey designed to assess the Site to a depth of approximately 30 feet indicated only sporadic
7 low concentrations of volatile hydrocarbons and those too are likely related to local background
8 groundwater concentrations.

9 The maximum depth of impacted soil (estimated at 22 feet) is well above groundwater
10 encountered at a depth of 38 feet or at least 16 feet below soil with detectable TPH concentrations.
11 Additionally, the soil gas survey work conducted in 2008 indicates that elevated VOC
12 concentrations are not present within, beneath, or adjacent to the impacted soil. These findings
13 indicate that the impacted soil is not considered a potential threat to the underlying groundwater.

14 Therefore, based on the data and analysis described above, the RWQCB is entirely
15 unwarranted to require groundwater assessment or any further health risk analysis at the Site.
16 Compounded by the cost of the investigation already performed on the Site, the additional technical
17 studies sought by the Order would make use of the Site as a park cost-prohibitive.

18 5. The Manner In Which Petitioner Is Aggrieved.

19 The Order fails to comply with Water Code § 13267, and all other applicable laws and
20 regulations, because:

21 (1) The Agency has not discharged, is not discharging, and is not suspected of discharging
22 or proposing to discharge any waste, as required by Section 13267, for the technical reports under
23 the Order.

24 (2) The burden, including the costs, of these reports does not bear a reasonable relationship
25 to the need for the reports and the benefits to be obtained from the reports given, for among other
26 reasons, the intended use of the Site as a park and the prior studies done for the same. In fact, the
27 additional technical studies sought by the Order would make the use of the Site as a park cost-
28 prohibitive.

1 (3) The Order fails to provide a sufficient written explanation with regard to the need for
2 the reports from the Agency and does not sufficiently identify the evidence that supports requiring
3 that the Agency provide the reports and technical information sought by the RWQCB.

4 (4) The RWQCB has applied the wrong standard in analyzing the Site through imposing
5 requirements for "residential land use", when the Site is intended to be used as a park.

6 (5) The Order requires that the Agency submit technical reports and perform investigations
7 under arbitrary and unreasonable timeframes.

8 6. The Specific Action By The State Or Regional Board Which Petitioner Requests.

9 Petitioner requests that the State Water Board order that the RWQCB set aside and vacate
10 the Order and further order that no additional technical studies or testing be imposed on the Site by
11 RWQCB, given the investigation already completed at the Site, as set forth in Paragraph 4, above.

12 Alternatively, if for any reason the State Water Board cannot order the foregoing, then the
13 Agency requests that the State Water Board order the RWQCB to eliminate all groundwater testing
14 requirements from the Order and modify the Order accordingly.

15 7. Statement Of Points And Authorities In Support Of The Legal Issues Raised By The
16 Petition.

17 The decision by the RWQCB must "bridge the analytic gap between the raw evidence and
18 the ultimate decision" under *Topanga Association For A Scenic Community v. County of Los*
19 *Angeles* (1974) 11 Cal.3d 506. The Order issued by the RWQCB is devoid of sufficient evidence
20 that the use of the Site as a park requires the additional testing and technical studies ordered by the
21 RWQCB.

22 Water Code § 13267, subdivision (b)(1), provides that:

23 In conducting an investigation specified in subdivision (a), the
24 regional board may require that any person who has discharged,
25 discharges, or is suspected of having discharged or discharging, or
26 who proposes to discharge waste within its region, or any citizen or
27 domiciliary, or political agency or entity of this state who has
28 discharged, discharges, or is suspected of having discharged or
discharging, or who proposes to discharge, waste outside of its
region that could affect the quality of waters within its region shall
furnish, under penalty of perjury, technical or monitoring program
reports which the regional board requires. The burden, including

1 costs, of these reports shall bear a reasonable relationship to the
2 need for the report and the benefits to be obtained from the reports.
3 In requiring those reports, the regional board shall provide the
4 person with a written explanation with regard to the need for the
5 reports, and shall identify the evidence that supports requiring that
6 person to provide the reports.

7 Here, the Agency has not discharged, is not discharging, and is not suspected of discharging
8 or proposing to discharge any waste, as required under Section 13267 for the technical reports
9 under the Order.

10 Additionally, the burden, including the costs, of the studies and reports sought by the Order
11 does not bear a reasonable relationship to the need for the studies and reports and the benefits to be
12 obtained from the same given, for among other reasons, the intended use of the Site as a park and
13 the prior studies done at the Site.

14 The Order also fails to provide a sufficient written explanation with regard to the need for
15 the reports from the Agency and does not sufficiently identify the evidence that supports requiring
16 that the Agency provide the reports and technical information sought by the RWQCB. The Order
17 requires that the Agency submit technical reports and perform investigations under arbitrary and
18 unreasonable timeframes.

19 8. Statement That The Petition Has Been Sent To The Appropriate Regional Board.

20 The petition has been sent to the RWQCB on February 19, 2009. The former suspected
21 discharger is no longer in business and thus the petition cannot be sent to that entity.

22 9. Statement That The Substantive Issues Or Objections Raised In The Petition Were
23 Previously Raised Before The RWQCB.

24 The Agency has complied with all applicable exhaustion requirements before the RWQCB
25 to the extent required by law. Any further efforts on the Agency's part to contest the Order before
26 the RWQCB are not required by law and would be futile.

27 10. Reservation Of Rights And Request For Preparation Of Administrative Record By
28 RWQCB.

The Agency reserves its rights to supplement or amend this petition and to seek a stay of the
Order. The Agency requests that the RWQCB prepare the administrative record in this matter. In

1 the event that testimony is needed to supplement or correct the matters set forth in this
2 administrative record, or as otherwise permitted by law, the Agency reserves its rights to request an
3 evidentiary hearing of this matter.

4 Respectfully submitted,

5 Dated: February 19, 2009

ALESHIRE & WYNDER, LLP
WILLIAM W. WYNDER
DAWN C. HONEYWELL
ANTHONY R. TAYLOR

6
7
8 By: 

9 Anthony R. Taylor, Esq.
10 Attorneys for Petitioner,
11 CARSON REDEVELOPMENT AGENCY
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT "A"



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

January 21, 2009

Mr. Jeff F. Westbrook
Redevelopment Manager
City of Carson
1 Civic Plaza Dr, Ste. 200
Carson, CA 90745

Certified Mail
Return Receipt Requested
Claim No. 7005 1820 0001 2683 6719

CALIFORNIA WATER CODE, SECTION 13267 ORDER TO COMPLETE SITE-SPECIFIC HUMAN HEALTH RISK ASSESSMENT FOR THE UNDEVELOPED PROPERTY LOCATED AT 21208 SHEARER AVENUE, CARSON, CA 90745-1520 (SLIC NO. 0496F5, SITE ID NO. 2040112)

Dear Mr. Westbrook:

The California Regional Water Quality Control Board (Regional Board), Los Angeles Region, is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties, including the referenced site.

The Regional Board staff has completed the review of the latest document titled *Soil Gas Investigation Report* dated July 11, 2008 prepared by Eco and Associates, Inc (EAI), along with other information in our case files. The Regional Board has been providing regulatory oversight for the environmental assessment of the undeveloped property of the City of Carson located at 21208 Shearer Avenue (Site). This letter provides comments and requirements, based on review of all documents in our file.

This Site is a 0.4 acre parcel which is currently undeveloped. Aerial photographs records also show that the property has been vacant since at least 1964. No building permits have ever been issued for the Site. The immediate surrounding to the north, east and south are residential, with a vacant lot adjoining the site directly to the east. Based on the Phase I investigation conducted by Jack K. Bryant and Associates, Inc. (JKB), the site had never been developed and was described as a low lying area collecting stormwater. The surroundings to the west were occupied by commercial and industrial facilities that include a now defunct oil refinery, the Golden Eagle Refinery located approximately 1,000 feet northwest of the site.

The Site is located in the West Coast Basin of the Coastal Plain of Los Angeles. According to the Department of Water Resources Bulletin No. 104, the saturated unit at the Site is perched water within the Bellflower aquiclude overlying the Gage aquifer which occurs at approximately 80 to 100 feet bgs. Based on the soil boring log, the Site is underlain by mixtures and layers of clay, silt, sand and gravel of alluvial origin. Groundwater was encountered at a depth of approximately 40 feet bgs.

California Environmental Protection Agency



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Since 1995, various consultants have conducted soil and soil gas sampling at the Site. Petroleum hydrocarbon impacted soil to a depth of 18 feet is found at the Site. Groundwater is encountered at 38 feet bgs or 20 feet below the impacted soil. No groundwater sample has been collected at the Site.

Eco and Associates conducted an excavation in August 2006 and removed approximately 2,671.45 tons (~ 1,780 cubic yards) of impacted soil. The post excavation confirmation soil analysis detected up to 31,580 mg/kg of total petroleum hydrocarbon (TPH). The excavation was backfilled using imported soil by Arroyo Geotechnical.

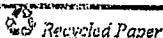
In 2007 and 2008, additional site assessment consisting of soil sampling and soil vapor survey was conducted at the Site. The TPH concentrations ranged between 24 and 15,400 mg/kg, with concentrations of up to 256 mg/kg gasoline range (C4 to C12), 5240 mg/kg of diesel range (C13 to C23), and 10,200 of heavy oil range (C23 to C36). Benzene was detected in few isolated samples and concentrations ranged between 0.058 and 0.157 mg/kg. A multi-depth soil vapor survey across the site yields concentrations up to 0.92 mg/L of gasoline range hydrocarbons, 1.1 µg/L benzene, 4.3 µg/L toluene, 0.57 µg/L ethylbenzene, and 1.5 µg/L xylenes. Benzene obtained from one sampling location of soil vapor samples collected at 5 feet depth is in excess of the California Human Health Screening Levels (CHHSLs) for residential land use.

COMMENTS AND REQUIREMENTS

Based on the results of the site investigation, the chemicals of concern (COCs) present in soil and soil vapor at the Site consist of TPH and BTEX. Due to the presence of benzene in soil vapor at concentration exceeding CHHSLs established for residential land use, you are directed to complete the following:

1. Based on all soil and soil vapor data available for the Site, you are required to provide a site-specific human health risk evaluation report for the planned land use that is, the development of the site into a passive park. The report is due to the Regional Board by **March 27, 2009**. The Regional Board seeks assistance from the Office of Environmental Health Hazard Assessment (OEHHA) to fully evaluate the adequacy of the human health risk assessment.
2. It is our understanding that the Site is planned to be redeveloped into a passive park for the surrounding residents. A land use covenant for the site is required prior to the no further action consideration for the soil only. A Recorded Covenant and Environmental Restriction on property located at 21308 Shearer Avenue, Carson, California will be required.
3. The Regional Board reiterates the requirement for groundwater quality determination beneath the site as directed in the Regional Board letter dated November 30, 2007 (Copy attached). Groundwater at the Site was never investigated. Therefore, you are required to develop a work plan for complete groundwater characterization at the Site. Investigation of the saturated zone must include continuous coring and collection of discrete groundwater samples with appropriate depth interval(s). The work plan is due to the Regional Board by **March 27, 2009**.
4. Pursuant to State Water Resources Control Board Resolution No. 92-49, under section 13304 of the California Water Code, all fieldwork related to well installation must be conducted by, or

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Jeff F. Westbrook
City of Carson

- 3 -

January 21, 2009

under the direct responsible supervision of a professional geologist or licensed civil engineer. All technical documents submitted to the Regional Board must be reviewed and signed and/or stamped by a California professional geologist, a California registered certified engineering geologist, or a California registered civil engineer with at least five years of professional experience. California Business and Professions Code Sections 6735, 7835 and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of California registered professionals.

You are directed to furnish the technical reports as required under the provision of Section 13267 of California Water Code. Therefore, pursuant to Section 13268 of the California Water Code, failure to submit the required technical reports and/or documents by the specified due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1,000) for each day the report or document is not received.

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

If you have any questions, please contact the Project Manager, Dr. Teklewold Ayalew at (213) 576-6743 or tayalew@waterboards.ca.gov, or Mr. Adnan Siddiqui at (213) 576-6812 or the Site Cleanup Program Manager, Dr. Arthur Heath at (213) 576-6725.

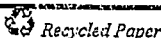
Sincerely,


Tracy J. Egoscue
Executive Officer

Attachment: Regional Board Letter dated November 30, 2007

Cc: Amelia Soto, City of Carson, Redevelopment Project Analyst
Mohammad Estiri, Eco and Associates

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

EXHIBIT "B"



CITY OF CARSON

February 17, 2009

Regional Water Quality Control Board
Attn: Dr. Teklewold Ayalew
320 W. 4th Street, #200
Los Angeles, CA 90013

RE: 21208 Shearer Ave., Carson, CA 90745-1520 -*Extension Request for Water
Code § 13267 Order To Complete Site-Specific Human Health Risk Assessment*

Dear Dr. Teklewold:

This is in response to the above-referenced order by the Regional Water Quality Control Board ("RWQCB") dated January 21, 2009 to the Carson Redevelopment Agency (the "Agency") and your request that the extension of time described below be made in writing to RWQCB by the Agency. Particularly, this letter addresses the RWQCB's order for a specific human health risk evaluation and a work plan for groundwater testing at the above-referenced property.

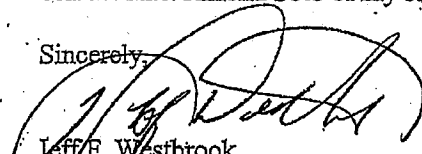
Without waiving the Agency's right to contest the order, we request that the due date for the technical reports sought in the above-referenced order be extended an additional ninety (90) days from the current March 27, 2009 deadline. This extension should allow the Agency enough time to gather the necessary data to better respond to the RWQCB's requests. As you know, we waited approximately nine months for your review of the soils vapor study you required us to perform, so this request is reasonable under these circumstances.

We are also requesting an extension of ninety (90) days to petition the State Water Board, as described at page three of the above-referenced order. Currently, we have no choice but to petition the State Water Board and contest the above-referenced order in its entirety by Friday, February 20, 2009, given the deadline you have given us to respond to the order. However, we would prefer to attempt to amicably resolve our differences if given sufficient time and the opportunity to do so through this requested extension.

Dr. Teklewold Ayalew
February 17, 2009
Page, 2

Please notify the Agency, as soon as possible, in writing once you have made a decision about this extension request. If you have any questions regarding this matter please contact Mrs. Amelia Soto of my staff at (310) 233-4823.

Sincerely,



Jeff F. Westbrook
Redevelopment Manager

cc: Cliff Graves, Economic Development General Manager
Tracey J. Egoscue, RWQCB
Adnan Siddiqui, RWQCB
Amelia Soto, Carson RDA
Dawn C. Honeywell, Esq.
Anthony R. Taylor, Esq.
Mohammad Estiri, Bco & Associates

EXHIBIT "C"



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

Linda S. Adams,
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

February 18, 2009

Mr. Jeff F. Westbrook
Redevelopment Manager
City of Carson
1 Civic Plaza Dr, Ste. 500
Carson, CA 90745

Certified Mail
Return Receipt Requested
Claim No. 7006 3450 0002 4641 8534

EXTENSION APPROVAL FOR SUBMITTAL OF TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE, SECTION 13267 ORDER FOR THE UNDEVELOPED PROPERTY LOCATED AT 21208 SHEARER AVENUE, CARSON, CA 90745-1520 (SLIC NO. 0496F5, SITE ID NO. 2040112)

Dear Mr. Westbrook:

The California Regional Water Quality Control Board (Regional Board), Los Angeles Region, is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties, including the referenced site.

The Regional Board staff has received the letter dated February 17, 2009 sent by Mr. Jeff F. Westbrook (copy attached) on behalf of Carson Redevelopment Agency for the Undeveloped Property located at 21208 Shearer Avenue, Carson, requesting an additional ninety (90) days for submittal of required technical reports pursuant to the California Water Code (CWC), Section 13267 Order (Order) dated January 21, 2009. The Order stipulates: 1) a site-specific human health risk evaluation report due to the Regional Board by March 27, 2009; and 2) a work plan for complete groundwater characterization due to the Regional Board by March 27, 2009. The rationale for the extension request is the longer than anticipated time for the preparation of the required technical reports.

The Regional Board approves your request for this one time extension to submit the required technical reports. You are now directed to submit the technical reports to the Regional Board by **May 29, 2009**.

In terms of your request for a 90-day extension to challenge the January 21, 2009 Order, you must follow the procedure indicated in the Order that states "Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request."

California Environmental Protection Agency



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Mark J. Sedlacek
Los Angeles Department of Water and Power

- 2 -

February 18, 2009

If you have any questions, please contact the Project Manager, Dr. Teklewold Ayalew at (213) 576-6743 or tayalew@waterboards.ca.gov, or Mr. Adnan Siddiqui at (213) 576-6812 or the Site Cleanup Program Manager, Dr. Arthur Heath at (213) 576-6725.

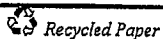
Sincerely,


Tracy J. Egoscue
Executive Officer

Attachment: Letter from Redevelopment Project Agency of the City of Carson

Cc: Amelia Soto, City of Carson, Redevelopment Project Analyst
Mohammad Estiri, Eco and Associates

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.